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UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WASHINGTON

Case No. 18-03197-FPC

The Honorable Frederick P. Corbit

Chapter 7

DECLARATION OF JUN DAM IN SUPPORT OF MOTION TO INTERVENE AND STAY PROCEEDINGS

In re:
GIGA WATT INC.,

Debtor

- I, Jun Dam, under penalty of perjury, pursuant to the laws of the State of Washington declares the following as true and correct:
- 1. **Creditor Status**: I am a creditor in this case, holding a claim for 1,025,660 tokens, with a filed Proof of Claim (Claim No. 52) for \$5,391,720.37.
- 2. **Exclusion from Omnibus Motion**: My claims were not included in the Trustee's First Omnibus Objection to Claims, despite being identical to those of other token holders and the largest claim in the class.
- 3. **Potential Prejudice**: If the claims of other token holders are dismissed, it would set a binding precedent that would impair my ability to defend my claims and would practically preclude me from litigating identical issues in the future.

- 4. **Filing History**: On October 22, 2024, I filed an objection to the Trustee's omnibus motion and a subsequent joinder to the objection of Georgios Lignos
- 5. **Judicial Economy and Equity**: Consolidating my claims with the omnibus motion and staying proceedings would prevent inconsistent rulings, ensure equitable treatment, and promote judicial economy.

Dated this 22nd day of November, 2024

Jun Dam (*Pro Se*)

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CERTIFICATE OF SERVICE

I hereby certify that on 11/22/24 I electronically filed the foregoing **DECLARATION OF JUN DAM IN SUPPORT OF MOTION TO INTERVENE AND STAY PROCEEDINGS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all ECF participants.

Date Served: 11/22/2024

Sign your name:

Print name: Jun Dam